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Attorney for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

**IN RE:**

**J&D CONSTRUCTION, LLC**

**Debtor**

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**CASE NO. 19-70190-HDH-11  
(Chapter 11)**

**APPLICATION TO EMPLOY ATTORNEYS**

The application of J&D Construction, LLC, Debtor, respectfully represents:

1. Debtor has filed a petition herein under Chapter 11 of Title 11, United States Code.
2. Debtor is engaged in the business of providing construction services with a place of business at 1210 30<sup>th</sup> Street, Wichita Falls, Texas.
3. The Debtor, as Debtor in Possession, wishes to employ John A. Leonard and the law firm of Leonard, Key & Key PLLC, as attorneys under a general retainer to give the Debtor legal advice with respect to its powers and duties as a Debtor in Possession in the continued operation of the Debtor's business and management of the Debtor's property and to perform all legal services for the Debtor in Possession which may be necessary herein.
4. Your applicant has selected John A. Leonard and the law firm of Leonard, Key & Key PLLC for the reason that they have gained experience as to the Debtor's business and property by filing a petition herein, that the Debtor believes that said law firm is well qualified to

represent the Debtor, as Debtor in Possession, in this proceeding. Furthermore, it is necessary for the Debtor, as Debtor in Possession, to employ attorneys for such professional services.

5. To the best of Debtor's knowledge, John A. Leonard and the law firm of Leonard, Key & Key PLLC have the following connection with Debtor; None

6. No party in interest has requested the appointment of a trustee, and thus no notice of this application needs to be given and no hearing thereon needs to be held because of presumption accorded the Debtor in Possession pursuant to 11 U.S.C. §1107(b).

WHEREFORE, your Application prays that the Debtor be authorized to employ John A. Leonard, of the firm of Leonard, Key & Key PLLC, or any of its members (attorneys), under a general retainer to represent the Debtor in Possession in this proceeding under Chapter 11 of Title 11, United States Code, and that said Debtor have such other and further relief as is just.

Respectfully submitted,

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By: /s/ John A. Leonard  
John A. Leonard  
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